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March 11, 2011

Via ECF and Facsimile

Magistrate Madeline Cox Arleo
United States District Court for
the District of New Jersey
Martin Luther King, Jr. Federal Building & U.S. Courthouse
50 Walnut Street
Room MLK 2A
Newark, New Jersey 07101

Re: Civil Action No. 2:10-cv-05604-SDW-MCA; *American General Life Insurance Company v. Teller Family Irrevocable Trust VI, by and through its trustee, Gerson Sontag a/k/a Gershon Sontag, and Teller Family Irrevocable Trust VII, by and through its trustee, Bezalel Bernstein a/k/a Btalel Bernstein*; In the United States District Court for the District of New Jersey.

Dear Judge Arleo:

This letter is a follow-up to my letter of March 4, 2011, in which I notified the Court regarding the parties' inability to come to an agreement on a proposed Discovery Confidentiality Order ("Order") (see attached letter with exhibits). Pursuant to my conversation with your law clerk, Jessica, I am submitting this letter to outline the current status of discussions between the parties and the outstanding issues. Counsel for Defendants, Ms. Eilender, has reviewed this letter and is in agreement with its contents.

After sending the March 4, 2011, letter, I received a call from Jessica, who indicated that counsel should look to the applicable Local Rules and the form Discovery Confidentiality Order to see if the parties might come to an agreement. I have since spoken to Ms. Eilender and the parties still are unable to agree on a proposed Order.

Working from the District of New Jersey's form Order, counsel for Defendants requests inclusion of two provisions: 1) the addition of the words "or for use in any other action against American General" in the second line of paragraph 3 of the Order, after the word "action"; and 2) addition of a new paragraph 17 that provides for fees and costs should Plaintiff designate a

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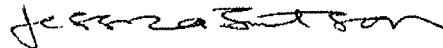
document as confidential, which designation Defendants successfully petition the Court to remove. Plaintiff does not agree to the inclusion of these two provisions.

The parties jointly request a conference with this Court so that the Court may provide guidance to the parties regarding finalization of the Order. Lead counsel for Plaintiff lives in Houston, Texas, and, to minimize costs, requests a telephonic conference. Counsel for Defendants is in agreement with this request. However, should the Court determine an in-person conference is more appropriate, the parties are prepared to attend in order to resolve this issue.

Thank you for your attention to this matter.

Very truly yours,

Edison, McDowell & Hetherington LLP



Jessica L. Wilson

/JLW

cc: *Via Email*
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